

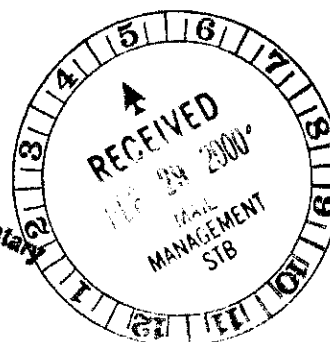
**Stanchem**

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Mr. Vernon A. Williams, Secretary
Surface Transportation Board
Office of the Secretary
Case Control Unit
Attn: STB Ex Parte No. 582
1925 K Street, NW
Washington D.C. 20423-0001

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FEB 29 2000
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Dear Sir:

Stanchem Inc. a division of Holland Chemicals International is a chemical distribution company that uses rail services through North America. The purpose of this letter is to comment on the issues that are to be discussed by your Board March 8, 2000 (Ex. Parte 582).

We encourage the Board to focus on the proposed CN-BNSF merger as being good for shippers rather than on potential downstream effects. The CN-BNSF merger should be judged on its own merits not on whether other carriers oppose the proposed merger.

The timing of the proposed CN-BNSF merger is not the issue for our company. Our only concern at this time is service. I understand that some recent mergers have failed on service, not timing. The Surface Transportation Board should focus on ensuring that this and any other future mergers will deliver service.

The Surface Transportation Board has a process to evaluate railroad transactions and protect the public interest. It should evaluate thoroughly the proposed CN-BNSF merger according to that process. I do not feel that other railroads should use the Surface Transportation Board process merely to protect themselves and not the shipping public.

Sincerely,

E.R. McPherson
Logistics Specialist
Stanchem Inc.



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A Total Commitment®